

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 17 C 4719
	)	
S. CRIDER CONSTRUCTION & SUPPLY	)	JUDGE MATTHEW F. KENNELLY
CO., a dissolved Illinois corporation,	)	
	)	
STEFAN K. CRIDER, d/b/a S. CRIDER	)	
CONSTRUCTION & SUPPLY CO.,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on June 16, 1998, request this Court enter judgment against Defendants, S. Crider Construction & Supply Co., a dissolved Illinois corporation, and Stefan K. Crider, d/b/a S. Crider Construction & Supply Co. In support of that Motion, Plaintiffs state:

1. On September 6, 2017, this Court entered default against Defendants and granted Plaintiffs' request for an order directing an audit of the Defendants' payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. Plaintiffs' auditors completed that audit on or about January 3, 2018. The audit findings show that the Defendants are delinquent in contributions to the Funds in the amount of \$103,302.52. (See Affidavit of Joseph J. Burke).

3. Additionally, the amount of \$18,315.14 is due for liquidated damages. (Burke Aff. Par. 5). Plaintiffs' auditing firm of Legacy Professionals, LLP charged Plaintiffs \$3,149.64 to perform the audit examination and complete the report (Burke Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended \$482.00 in costs and \$2,591.25 in attorneys' fees, for a total of \$3,073.25, in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$127,840.55.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$127,840.55.

/s/ Patrick N. Ryan

Patrick N. Ryan  
Attorney for the Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 216-2573  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)

I:\MIDJ\Crider, S. Construction\motion-judgment.pnr.df.wpd

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 5th day of February 2018:

Mr. Stefan K. Crider, Jr., Registered Agent  
S. Crider Construction & Supply Co.  
529 Woodbridge Drive  
Quincy, IL 62301

Mr. Stefan K. Crider, Jr.  
529 Woodbridge Drive  
Quincy, IL 62301

/s/ Patrick N. Ryan \_\_\_\_\_

Patrick N. Ryan  
Attorney for the Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 216-2573  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)